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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION**

13 || UNITED STATES OF AMERICA,

Case No. CR 12-00723-EJD

14 Plaintiff,

**STIPULATION AND [PROPOSED] ORDER  
TO CONTINUE BRIEFING SCHEDULE**

16 | VICTOR MANUEL RODRIGUEZ,

**Defendant**

19 It is hereby stipulated and agreed to between plaintiff United States of America, through  
20 counsel of record, Daniel R. Kaleba and Stephen J. Meyer, Assistant United States Attorneys,  
21 and defendant Victor Manuel Rodriguez, through his counsel of record, Mark D. Flanagan and  
22 Michael A. Mugmon, that the December 19, 2014, due date for filing sentencing memoranda be  
23 rescheduled to January 9, 2015, in order to give the parties additional time to prepare for the  
24 hearing. The sentencing hearing is scheduled for January 29, 2015 at 1:30 p.m. Specifically, the  
25 parties require additional time to prepare their sentencing memoranda because they did not  
26 receive the U.S. Probation Office's Final Presentence Investigation Report until December 15,  
27 2014. The parties further stipulate that responses to sentencing memoranda, if any, shall be filed  
28 no later than January 23, 2015.

1 SO STIPULATED.

2  
3 Dated: December 17, 2014

*/s/ Mark D. Flanagan*  
4 MARK D. FLANAGAN  
MICHAEL A. MUGMON

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8 Attorneys for Defendant  
Victor Manuel Rodriguez

Dated: December 17, 2014

*/s/ Stephen J. Meyer*  
9 DANIEL R. KALEBA  
STEPHEN J. MEYER

10 Assistant United States Attorneys

11  
12 [PROPOSED ORDER]

13 Pursuant to the stipulation of the parties, and for good cause having been shown, IT IS  
14 HEREBY ORDERED THAT the due date for defendant's filing of sentencing memoranda,  
15 currently December 19, 2014, is rescheduled to January 9, 2015, and any responses thereto, if  
16 any, shall be filed no later than January 23, 2015.

17  
18 Date: \_\_\_\_\_

19 Hon. Edward J. Davila  
United States District Court Judge

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## ATTESTATION OF E-FILED SIGNATURE

I, Mark D. Flanagan, am the ECF User whose ID and password are being used to file this document. I hereby attest that Stephen J. Meyer has concurred in this filing.

Dated: December 17, 2014

/s/ Mark D. Flanagan  
Mark D. Flanagan